CARE Ratings
Professional Risk Opinion

Date: September 21, 2021
SE/2021-22/41

To,

The General Manager The Corporate Relation Department BSE Limited Phiroza Jeejeebhoy Towers 14th Floor, Dalal Street Mumbai 400 001 **Scrip Code: 534804**	**The National Stock Exchange India Ltd.** Listing Department Exchange Plaza Bandra Kurla Complex Bandra (East) Mumbai 400 051 **Scrip Code: CARERATING**

Dear Sir / Madam,

Sub: Reporting of Violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015- CARE Ratings Limited ("Company")

This is in reference with SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 (**"SEBI Circular"**). The Company hereby report violation related to its Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by one of its designated person.

Details of the violation are provided as per **Annexure-A** of the SEBI Circular and is enclosed.

The Company hereby inform you that considering this was first instance of violation by the designated person which was done erroneously, we have issued warning letter to him.

We request you to take above information on your record.

Thank you,

Yours Sincerely,
For **CARE Ratings Limited**

Nehal Shah

Nehal Shah
Company Secretary & Compliance Officer
Encl: As above

CARE RATINGS LIMITED MUMBAI INDIA

Annexure A

Report by Care Ratings Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

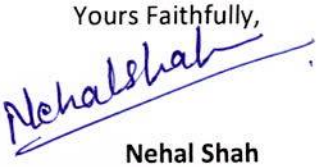
Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/ ~~Fiduciary~~	CARE Ratings Limited
2	Please tick appropriate checkbox Reporting in capacity of: √Listed Company √ Intermediary ☐ Fiduciary	
3	**A. Details of Designated Person (DP)**	Employee
	i. Name of the DP	Mr. Ravi Nayak
	ii. PAN of the DP	AHQPN4035K
	iii. Designation of DP	Assistant Director
	iv. Functional Role of DP	Criteria & QCT department
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	No
	i. Name of the immediate relative of DP	N.A
	ii. PAN of the immediate relative of DP	N.A
	C. Details of transaction(s)	
	i. Name of the scrip	Alembic Pharmaceuticals Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	200 equity shares and Transaction value is Rs. 1,55,219.71/-
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter	Not Applicable since value of trades reported under point C above did not exceed Rs.10 Lacs
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	
4	Details of violations observed under Code of Conduct	DP has violated Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by purchase of equity shares of the scrip without taking preclearance approval for the same from the company inadvertently.

<table>
<tr><td>5</td><td>Action taken by Listed company/ Intermediary/ ~~Fiduciary~~</td><td>The Company has issued a warning letter to DP.</td></tr>
<tr><td>6</td><td>Reasons recorded in writing for taking action stated above</td><td>The action stated above was taken after considering the fact that first instance of inadvertent violation made by DP erroneously in placing the order on exchange.</td></tr>
<tr><td>7</td><td>Details of the previous instances of violations, if any, since last financial year</td><td>N.A</td></tr>
<tr><td rowspan="3">8</td><td>If any amount collected for Code of Conduct violation(s)</td><td>N.A</td></tr>
<tr><td>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)
ii. Details of transfer/payment</td><td>N.A</td></tr>
<tr><td colspan="2">In case of Online:
<table>
<tr><th>Particulars</th><th>Details</th></tr>
<tr><td>Name of the transferor</td><td rowspan="5">N.A</td></tr>
<tr><td>Bank Name, branch and Account number</td></tr>
<tr><td>UTR/Transaction reference Number</td></tr>
<tr><td>Transaction date</td></tr>
<tr><td>Transaction Amount (in Rs.)</td></tr>
</table>
In case of Demand Draft (DD):
<table>
<tr><th>Particulars</th><th>Details</th></tr>
<tr><td>Bank Name and branch</td><td rowspan="4">N.A</td></tr>
<tr><td>DD Number</td></tr>
<tr><td>DD date</td></tr>
<tr><td>DD amount (in Rs.)</td></tr>
</table></td></tr>
<tr><td>9</td><td>Any other relevant information</td><td>N.A</td></tr>
</table>

Date: September 21, 2021
Place: Mumbai

Yours Faithfully,





Nehal Shah
Company Secretary & Compliance Officer
PAN: AAPPS2191H
Email: nehal.shah@careratings.com